



State of Utah

Department of Natural Resources

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Division of Oil, Gas & Mining

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August 27, 2004

CERTIFIED RETURN RECEIPT
7099 3400 0016 8896 0686

Lon Thomas
Star Stone Quarries, Inc.
4040 South 300 West
Salt Lake City, Utah 84107

Subject: Initial Review of Notice of Intention to Commence Large Mining
Operations, Star Stone Quarries, Inc., Torrey Mine, M/055/016, Wayne
County, Utah

Dear Mr. Thomas:

The Division has completed its review of your draft Notice of Intention to Commence Large Mining Operations for the Torrey Quarry, located in Wayne County, Utah, which was received July 6, 2004. After reviewing the information, the Division has the following comments which will need to be addressed before tentative approval may be granted.

The comments are listed below under the applicable Minerals Rule heading. Please format your response in a similar fashion. **Please address only those items requested in the attached technical review. You may send replacement pages of the original mining notice using redline and strikeout text, so we can see what changes have been made. After the notice is determined technically complete and we are prepared to issue final approval, we will ask that you send us two clean copies of the complete and corrected plan. Upon final approval of the permit, we will return one copy stamped "approved" for your records. Please provide a response to this review by October 1, 2004.**

We understand you submitted a copy of the plan to the Bureau of Land Management, and we have yet to receive comments from them. They may have additional issues that will need to be addressed prior to tentative approval.

Lon Thomas
Page 2 of 2
M/055/016
August 27, 2004

The Division will suspend further review of the Torrey Quarry Notice of Intention until your response to this letter is received. If you have any questions in this regard please contact me, Tom Munson, Paul Baker or Doug Jensen of the Minerals Staff. If you wish to arrange a meeting to sit down and discuss this review, please contact us at your earliest convenience. Thank you for your cooperation in completing this permitting action.

Sincerely,

A handwritten signature in black ink, appearing to read "Daron R. Haddock". The signature is fluid and cursive, with the first name "Daron" and last name "Haddock" clearly distinguishable.

Daron R. Haddock, Permit Supervisor
Minerals Regulatory Program
Division of Oil, Gas and Mining

DRH:PBBjb
Attachment: Review
cc: Buzz Rakow, Hanksville BLM
O:\M055-Wayne\M0550016-TorreySandstone\final\LMO-REVIEW-08272004.doc

INITIAL REVIEW OF NOTICE OF INTENTION TO COMMENCE LARGE MINING OPERATIONS

Star Stone Quarries, Inc.
Torrey Quarry

M/055/016
August 27, 2004

R647-4-106 - Operation Plan

106.6 Plan for protecting & redepositing soils

The operator intends to expand the quarry by about 1.5 acres, and about 50 cubic yards of soil would be salvaged from this area. According to information in the plan, this is all the soil that can be saved from this area, but it amounts to only about 0.25 inches spread evenly over the entire expansion area. This is not enough soil to support plant growth, especially if it is placed directly over bedrock. For this reason, the operator needs to present a plan for replacing enough soil or substitute material to allow for plant growth. If substitute soil, such as overburden or waste, is used in this area, it needs to first be tested for coarse fragment content, texture, nutrient levels, and salts. (PBB)

Section 110.05 (should this be 110.5?) says salvaged soil material from the topsoil stockpile will be spread at a three-inch depth using a front end loader. Map 3 shows a 0.25-acre soil stockpile near the west entrance to the mine site. Spreading three inches of soil over 6.7 acres would require 2700 cubic yards of material, and if this much material was stacked evenly over 0.25 acres, it would be 6.7 feet deep. (PBB)

There is a semi-reclaimed area where the topsoil stockpile is shown on the map, but, from photos the Division has of this area and based on the inspector's recollections, it does not appear 2700 cubic yards of material has been stored in this area. Please confirm whether this much soil is available. (PBB)

The plan needs to discuss the nature of material over which soil would be replaced. Three inches of soil over about a foot of overburden would probably be adequate for establishing adequate plant growth, but three inches of soil over bedrock would not be sufficient. Please indicate what sort of growth medium will be below the replaced topsoil. (PBB)

If three inches of topsoil is not available, then please identify what substitute soils can be used. As discussed above, any substitute soils would need to be tested for texture (including coarse fragments), nutrient levels, and salts. (PBB)

The Division encourages the operator to use as much overburden and waste material as possible as subsoil. (PBB)

106.7 Existing vegetation - species and amount

According to the plan, the "canopy coverage" is about 10 percent which includes pinyons, junipers, and understory vegetation. The plan includes a list of species anticipated to be in the area. The revegetation requirement would be 7.0 percent cover. (PBB)

The information in the plan is adequate, but the Division would like to verify the ground cover percentages and the species present in the area. (PBB)

R647-4-107 - Operation Practices

107.1 Public safety & welfare

107.1.14 Posting warning signs

A sign should be posted warning the public that heavy equipment is operating at the site. (DJ)

107.1.15 Constructing berms, fences, etc. above highwalls

The plan states that there will be no highwall as a result of the quarrying effort in this area. While there are no highwall there are a banks of material on the outer edge of the quarry which will need to be reduced to a minimum of 3:1 slope. (DJ)

107.2 Drainages to minimize damage

The plan states there is a dry drainage which is not restricted in any way by mining. When visiting the site there was evidence of waste piles and excavations in the channel. This will need to be addressed in the plan by a statement that no waste materials will be left or major excavations will remain in the channel following on-site activities to restrict flow in any way. (TM)

R647-4-110 - Reclamation Plan

110.1 Current & post mining land use

The plan lists the current and postmining land uses as barren desert. Although the site does not have a lot of vegetation, there is enough for wildlife and grazing land uses that should be listed for both the current and postmining land uses. (PBB)

110.2 Roads, highwalls, slopes, drainages, pits, etc., reclaimed

While the quarry will not create a highwall, the slope created by the quarry will need to be reduced to slopes of less than 3:1. (DJ)

The plan states that topsoil for reclamation will be taken from the topsoil stockpile or an outside source. What is the source of this outside material? (DJ)

The plan states that the quarry pit will be backfilled. Please include in the plan the depth of this back-fill and include this in the surety. (DJ)

110.5 Revegetation planting program

Because of the limited precipitation in the area, it is important that surface preparation be done properly and so the surface is very rough. According to the plan, three inches of soil will be spread using a front end loader, and the seed bed will be scarified with the loader teeth. (PBB)

Following recontouring and topsoil replacement, all surfaces that are to be revegetated need to be ripped parallel to the contour at least 24 inches deep with ripper bars spaced no more than 36 inches apart; the teeth on a front end loader cannot adequately relieve compaction. Alternatively, a trackhoe could be used to gouge the surface, and this could also relieve compaction if it was done deeply enough. The plan should be modified to include a commitment to this effect. The treatment should provide for both relieving compaction and roughening the site. (PBB)

R647-4-111 - Reclamation Practices

- 111.7 Highwalls stabilized at 45 degrees or less**
See comment under Section 110.2

R647-4-112 - Variance

The operator has requested a variance from reclamation requirements for the road running through the property. This road apparently existed prior to the mining operation, so the Division can accept this variance proposal. (PBB)

R647-4-113 - Surety

An evaluation of the surety included with this application will need to be modified to include any changes as a result of this review. (DJ)

R647-4-116 - Public Notice & Appeals

Public notice will be given when the Division is prepared to issue tentative approval.

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

LON THOMAS
STARSTONE QUARRIES INC
4040 S 300 W
SLC UT 84107

JB DOGM M/055/016 8/27/04

2. Article Number

(Transfer from service label) 7099 3400 0016 8896 0686

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

Katie Lund

☐ Agent☒ Addressee

B. Received by (Printed Name)

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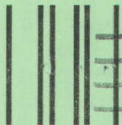
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Joelle Burns
State of Utah
Division of Oil, Gas and Mining
1594 West North Temple Suite 1210
Salt Lake City UT 84114-5801

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DIV. OF OIL, GAS & MIN.



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LON THOMAS - STAR STONE QUARRIES INC

Street, Apt. No.; or PO Box No.

4040 S 300 W

City, State, ZIP+4

SALT LAKE CITY UT 84107

7099 3400 0016 8896 0686 9890 9688 9100 0040 6607